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Co-Counsel for the Debtors and Debtors-in-Possession

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:

MERCON B.V.,

Debtor.

Chapter 11

Case No. 23-11947 (MEW)

Deadline to Object: October 2, 2024, at 4:30 p.m. (Eastern Time)
Hearing Date: October 9, 2024, at 11:00 a.m. (Eastern Time)

**SUMMARY OF COMBINED SIXTH MONTHLY FEE STATEMENT AND
FINAL APPLICATION OF CHIPMAN BROWN CICERO & COLE, LLP FOR
COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF
EXPENSES INCURRED AS CO-COUNSEL TO THE DEBTORS AND DEBTORS IN
POSSESSION FOR THE (I) MONTHLY PERIOD FROM JUNE 1, 2024 THROUGH
AND INCLUDING JULY 31, 2024; AND FOR THE (II) FINAL PERIOD FROM
DECEMBER 13, 2023 THROUGH AND INCLUDING JULY 31, 2024**

<i>Name of Applicant:</i>	Chipman Brown Cicero & Cole, LLP
<i>Authorized to Provide Professional Services to:</i>	Debtor and Debtor-in-Possession, Effective December 13, 2023
MONTHLY PERIOD	
<i>Period for Which Monthly Compensation and Reimbursement is Sought:</i>	June 1, 2024, through July 31, 2024 (“ Monthly Compensation Period ”)
<i>Amount of Monthly Compensation Sought as Actual, Reasonable and Necessary:</i>	\$68,546.50
<i>Amount of Monthly Expense Reimbursement Sought as Actual, Reasonable and Necessary:</i>	\$465.86

<i>Total Monthly Fees and Expenses Sought:</i>	\$69,012.36
FINAL PERIOD	
<i>Period for Which Final Compensation and Reimbursement is Sought:</i>	December 13, 2023, through July 31, 2024 (“ Final Compensation Period ”)
<i>Amount of Final Compensation Sought as Actual, Reasonable and Necessary:</i>	\$494,650.37
<i>Amount of Final Expense Reimbursement Sought as Actual, Reasonable and Necessary:</i>	\$3,306.84
<i>Total Final Fees and Expenses Sought:</i>	\$497,997.75
<i>Blended Rate for Final Compensation Period:</i>	\$642.15
<i>Compensation Sought in this Application Already Paid Pursuant to Interim Compensation Procedures Order:</i>	\$329,259.31
<i>Number of Professionals Included in the Final Compensation Period:</i>	Ten (10)
<i>Number of Professionals Billing Fewer than Fifteen (15) Hours During the Final Compensation Period:</i>	Five (5)
<i>Increase in Rates?</i>	Yes

This is a(n) _____ Interim ☒ Monthly ☒ Final Fee Application.

SUMMARY OF MONTHLY FEE STATEMENTS

DATE FILED	PERIOD COVERED	REQUESTED		PAID		HOLDBACK FEES (20%)
		FEES	EXPENSES	FEES (80%)	EXPENSES (100%)	
03.01.2024 [Docket No. 221]	12.13.2023 – 01.31.2024	\$99,596.50	\$712.62	\$79,677.20	\$712.62	\$19,919.20
03.22.2024 [Docket No. 270]	02.01.2024 – 02.29.2024	\$108,612.75	\$272.17	\$86,890.20	\$272.17	\$86,890.20
04.17.2024 [Docket No. 360]	03.01.2024 – 03.31.2024	\$61,272.62	\$156.85	\$49,018.09	\$156.85	\$12,254.53
05.22.2024 [Docket No. 518]	04.01.2024 - 04.30.2024	\$82,170.00	\$850.48	\$65,736.00	\$850.48	\$16,434.00
06.14.2024 [Docket No. 605]	05.01.2024 – 05.31.2024	\$74,452.50	\$848.86	\$59,562.00	\$848.86	\$14,890.50
Included Herein	06.01.2024 – 07.31.2024	\$68,546.50	\$465.86	N/A	N/A	N/A
TOTAL:		\$494,650.37	\$3,306.84	\$340,883.49	\$2,840.98	\$150,388.43

Objections to Monthly Fee Statements: None.

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FINAL APPLICATION OF CHIPMAN BROWN CICERO & COLE, LLP FOR
COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF
EXPENSES INCURRED AS CO-COUNSEL TO THE DEBTORS AND DEBTORS-IN-
POSSESSION FOR THE (I) MONTHLY PERIOD FROM JUNE 1, 2024 THROUGH
AND INCLUDING JULY 31, 2024; AND FOR THE (II) FINAL PERIOD FROM
DECEMBER 13, 2023 THROUGH AND INCLUDING JULY 31, 2024**

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [Docket No. 108] (the “**Interim Compensation Order**”), Rule 2016-1 of the Local Rules for the U.S. Bankruptcy Court for the Southern District of New York (the “**Local Rules**”), and Part F of the *Appendix B—Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases* (the “**Appendix B Guidelines**”), Chipman Brown Cicero & Cole, LLP (“**CBCC**”), as co-counsel to the above-captioned debtors and debtors in possession

(collectively, the “**Debtors**”), hereby submits its combined sixth monthly and final fee application (this “**Application**”) for (i) final allowance of compensation in the amount of \$494,650.37 for the reasonable and necessary legal services CBCC rendered to the Debtors from December 13, 2023 through July 31, 2024 (the “**Final Compensation Period**”), including from June 1, 2024 through July 31, 2024 (the “**Monthly Compensation Period**”); and (ii) reimbursement for the actual and necessary expenses that CBCC incurred during the Final Compensation Period, in the amount of \$3,306.84. In support of this Application, CBCC respectfully represents:

JURISDICTION

1. This Court has subject matter jurisdiction to consider and determine this Application pursuant to 28 U.S.C. §§ 157 and 1334, and the *Amended Standing Order of Reference M-341*, dated January 31, 2012 (Preska, C.J.). Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409. This is a core proceeding pursuant to 28 U.S.C. § 157(b). The statutory and legal predicates for the relief requested herein are sections 330 and 331 of the Bankruptcy Code, Bankruptcy Rule 2016, and Local Rule 2016-1.

BACKGROUND

I. THE CHAPTER 11 CASES.

2. On December 6, 2023 (the “**Petition Date**”), the Debtors commenced the Chapter 11 Cases by filing voluntary petitions for relief under chapter 11 of the Bankruptcy Code.

3. Prior to the Effective Date, the Debtors continued in possession of their properties and operated and managed their businesses as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No request has been made for the appointment of a trustee or examiner in these Chapter 11 Cases.

4. On January 19, 2024, the Debtors filed the *Debtors’ Application for Entry of an Order Authorizing the Retention and Employment of Chipman Brown Cicero & Cole, LLP as Co-*

Counsel to the Debtors and Debtors in Possession Nunc Pro Tunc to December 13, 2023 [Docket No. 148] (the “**Retention Application**”).

5. On February 29, 2024, the Court entered the *Order Authorizing the Retention and Employment of Chipman Brown Cicero & Cole, LLP as Co-Counsel to the Debtors and Debtors in Possession Nunc Pro Tunc to December 13, 2023* [Docket No. 218] (the “**Retention Order**”).

II. THE PLAN.

6. On May 22, 2024, the Debtors filed the *Fourth Amended Joint Chapter 11 Plan of Liquidation for Mercon Coffee Corporation and Certain Affiliated Debtors* [Docket No. 516] (as may be further amended, modified or supplemented, the “**Plan**”).

7. On July 30, 2024, the Court entered the *Findings of Fact, Conclusions of Law, and Order Confirming Fourth Amended Joint Chapter 11 Plan of Liquidation for Mercon Coffee Corporation and Certain Affiliated Debtors* [Docket No. 690] (the “**Confirmation Order**”).

8. Pursuant to the *Notice of (I) Occurrence of Effective Date and (II) Administrative Claims Bar Date*, the Plan became effective on July 31, 2024 [Docket No. 706] (the “**Effective Date**”).

9. In support of this Application, attached are the following exhibits:

- **Exhibit A** is the Declaration of Robert A. Weber.
- **Exhibit B-1 and B-2** is a schedule providing certain information regarding the CBCC attorneys and paraprofessionals for whose work on these Chapter 11 Cases compensation is sought in this Application. The Professionals of CBCC have expended a total of 770.4 hours in connection with these Chapter 11 Cases during the Final Compensation Period, including a total of 108.1 hours during the Monthly Compensation Period.
- **Exhibit C-1 and C-2** is a schedule of the number of hours expended and fees incurred (on an aggregate basis) by CBCC attorneys and paraprofessionals during the Final Compensation Period with respect to each of the subject matter categories CBCC established in accordance with its internal billing procedures. As referenced in **Exhibit C**, CBCC incurred \$494,650.37 in fees during the Final Compensation Period, including a total of \$68,546.50 in fees during the Monthly Compensation Period.

- **Exhibit D-1 and D-2** is a schedule of necessary and reasonable expenses incurred during the Final Compensation Period in the rendition of the professional services to the Debtors. As referenced in **Exhibit D**, CBCC incurred \$3,306.84 in expenses during the Final Compensation Period, including a total of \$465.56 in expenses during the Monthly Compensation Period.
- **Exhibit E** consists of CBCC's detailed records of fees incurred during the Monthly Compensation Period in the rendition of the professional services to the Debtors.

DESCRIPTION OF SERVICES AND EXPENSES AND RELIEF REQUESTED

10. In general, CBCC has represented the Debtors in connection with the following aspects of these Chapter 11 Cases:

- (a) advised the Debtors on matters involving or implicating the automatic stay, including actions by creditors, customers, and other parties in interest, and the Debtors' powers and duties as debtors in possession;
- (b) attended meetings and negotiating with representatives of creditors and other parties in interest;
- (c) advised the Debtors in connection with the collection of accounts receivable, including communications with counterparties, the development of settlement procedures to facilitate the Debtors' collection efforts, and the preparation and prosecution of a motion for the approval of the same;
- (d) advised the Debtors in connection with the analysis, assumption and rejection of executory contracts and unexpired leases, including the development of procedures to facilitate the Debtors' streamlined rejection of executory contracts, and the preparation and prosecution of a motion for the approval of the same;
- (e) advised the Debtors with respect to a key employee retention plan, including the preparation and prosecution of a motion for the approval of the same; and
- (f) provided such other necessary legal services requested by the Debtors in connection with the prosecution of these Chapter 11 Cases.

11. To provide an orderly and meaningful summary of the services rendered by CBCC on behalf of the Debtors during the Final Compensation Period, CBCC established, in accordance with the Appendix B Guidelines and its internal billing procedures, separate matter codes in connection with the Chapter 11 Cases (the "**Project Categories**"). The following is a summary of the professional services rendered by CBCC during the Final Compensation Period organized in

accordance with CBCC's Project Categories. Nevertheless, under the circumstances, and given the interconnectedness of the issues in these Chapter 11 Cases, certain of these categories may overlap with one another and it is possible that fees attributed to a particular category could have been attributed to other categories. For the avoidance of doubt, however, no work performed by CBCC has been included in more than one Project Category.

B110 — Case Administration

Total Hours: 74.3 Fees: \$37,934.25

12. This category includes time spent filing documents with the Court, service thereof, maintenance of calendars and critical date lists, reviewing docket updates, communications with the U.S. Trustee, and review of work in process reports.

B140 — Relief from Stay/Adequate Protection Proceeding

Total Hours: 204.2 Fees: \$142,968.50

13. This category includes time spent addressing actions of creditors and third parties that implicate or violate the automatic stay. This matter further includes the evaluation and analysis of potential litigation to enforce the automatic stay, the preparation of numerous "cease and desist" letters and other correspondence concerning such actions, and communications with such parties, as well as client and co-counsel representatives.

B150 — Meetings of and Communications with Creditors

Total Hours: 4.0 Fees: \$3,005.00

14. This category includes time devoted to communications and meetings with creditors or their counsel.

B160 — Fee/Employment Applications

Total Hours: 86.2 Fees: \$41,659.00

15. This category includes time spent on the preparation of CBCC's retention application and related filings and the preparation of CBCC's monthly fee statements.

B170 — Fee/Employment Objections

Total Hours: 2.9 Fees: \$1,962.50

16. This category includes time spent on the preparation of CBCC's retention application and related filings and the preparation of CBCC's monthly fee statements.

B185 — Assumption/Rejection of Leases and Contracts

Total Hours: 104.7 Fees: \$60,150.00

17. This category includes time devoted to the development of streamlined procedures for the Debtors to address the rejection of burdensome or unnecessary executory contracts and unexpired leases, the preparation and prosecution of a motion to approve such procedures, and the preparation, service and filing of the Debtors' first and second omnibus contract rejection notices.

B190 — Other Contested Matters

Total Hours: 41.5 Fees: \$24,394.00

18. This category includes time spent on analyzing potential discovery in aid of potential actions to enforce the automatic stay or for the collection of accounts receivable, including the preparation of potential discovery requests.

B210 — Business Operations

Total Hours: 12.1 Fees: \$9,403.50

19. This category includes matters related to Debtors' business operations that are not part of a plan of reorganization or disclosure statement, including discussions with client and vendors regarding coffee shipments and other customer matters, review of contracts and delivery issues. CBCC also spent time under this matter reviewing certain insurance issues and advising the Debtors.

B220 — Employee Benefits/Pension

Total Hours: 9.1 Fees: \$6,292.50

P250 — Employee/Labor

Total Hours: 18.6 Fees: \$12,087.50

20. These categories reflect time spent working with the Debtors and their advisors to develop a key employee retention plan, the preparation of a motion to approve the retention plan, and the prosecution of such motion, as well as research regarding and the preparation of a motion to shorten notice, and the prosecution of such motion to shorten.

B230 — Financing/Cash Collateral

Total Hours: 98.9 Fees: \$74,357.62

21. This category includes time devoted to the evaluation and collection of accounts receivable and includes the preparation and service of dozens of demand letters and interacting and negotiating with counterparties. In addition, this matter includes time spent by CBCC developing a streamlined set of procedures to permit the Debtors to quickly and efficiently settlement disputes concerning accounts receivable, preparing the motion to approve such procedures, and attending the hearing at which such motion was approved, and time spent documenting various settlements with counterparties and obtaining approvals of such settlements as required.

B260 — Board of Directors Matters

Total Hours: 6.3 Fees: \$3,622.50

22. This category includes time devoted to matters concerning the Debtors' board of directors.

B310 — Claims Administration and Objections

Total Hours: 28.1 Fees: \$17,509.50

23. This category includes time spent evaluating potential claims objections, including procedures for resolution of claims, settlement procedures, setoff rights and collateral assignments.

B320 — Plan and Disclosure Statement

Total Hours: 42.4 Fees: \$31,081.00

24. This category includes time spent reviewing plan and disclosure statement provisions, consulting with co-counsel regarding the same, monitoring the progress of plan confirmation and objections, and attending a hearing on plan confirmation issues.

B410 — General Bankruptcy Advice/Opinions

Total Hours: 8.5 Fees: \$6,727.50

L120 — Analysis/Strategy

Total Hours: 2.0 Fees: \$1,578.00

25. These categories together consist of time devoted to rendering general bankruptcy advice on matters handled by CBCC attorneys, including research regarding legal arguments, personal jurisdiction, review of certain loan agreements, and attention to certain foreign litigation matters.

L160 — Settlement/Non-Binding ADR

Total Hours: 20.3 Fees: \$15,732.50

26. This category includes time devoted to negotiating and documenting potential settlements.

JM30 — Hearings

Total Hours: 2.7 Fees: \$1,395.00

27. This category includes time spent in preparation for court hearings and attending court hearings.

28. CBCC's previously filed Monthly Statements included (i) a detailed itemization of the service hours expended by matter and professional and (ii) a summary schedule of hours and fees categorized by project code. *See* Docket Nos. 221, 270, 360, 518, and 605. The Monthly Statements also included a detailed chronological itemization of the services rendered by each professional and paraprofessional, calculated by tenths of an hour. *Id.*

29. CBCC has endeavored to represent the Debtors in the most efficient manner possible. Moreover, CBCC has endeavored to coordinate with the other professionals involved in these cases so as to minimize any duplication of effort and to minimize attorneys' fees and expenses to the Debtors and the Debtors' estates.

30. No agreement or understanding exists between CBCC and any other person for the sharing of compensation received or to be received for services rendered in or in connection with these cases.

31. With respect to the level of compensation, section 330 of the Bankruptcy Code provides, in pertinent part, that the Court may award to a professional person, "reasonable compensation for actual, necessary services rendered." Section 330(a)(3), in turn, provides that:

In determining the amount of reasonable compensation to be awarded . . . , the court shall consider the nature, the extent, and the value of such services, taking into account all relevant factors, including—

- (a) the time spent on such services;
- (b) the rates charged for such services;
- (c) whether the services were necessary to the administration of, or beneficial at the time which the service was rendered toward the completion of, a case under this title;
- (d) whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed;
- (e) with respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the bankruptcy field; and

- (f) whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

11 U.S.C. § 330(a)(3).

32. The congressional policy expressed above provides for adequate compensation in order to continue to attract qualified and competent professionals to bankruptcy cases. *See In re Drexel Burnham Lambert Group, Inc.*, 133 B.R. 13, 18 (Bankr. S.D.N.Y. 1991) (“Congress’ objective on requiring that the market, not the Court, establish attorneys’ rates was to ensure that bankruptcy cases were staffed by appropriate legal specialists.”).

33. CBCC asserts that in accordance with the factors enumerated in 11 U.S.C. § 330, the amount requested is fair and reasonable given (a) the complexity of these cases, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services, (e) the costs of comparable services other than in a case under this title, and (f) the results obtained for unsecured creditors. It is respectfully submitted that, had counsel with less experience in these types of matters been retained, the cost to the estate would have been much greater.

34. The fees charged by CBCC in these cases are billed in accordance with the existing billing rates and procedures in effect during the Final Compensation Period. The services rendered by CBCC were necessary and beneficial to the Debtors, consistently performed in a timely manner, and reasonable in light of the value of such services to the Debtors, CBCC’s demonstrated skill and expertise in the bankruptcy field, and the customary compensation charged by comparably skilled practitioners. Accordingly, CBCC submits that approval of the compensation for professional services and reimbursement of expenses sought herein is warranted.

RESERVATION OF RIGHTS

35. Although every effort has been made to include all fees and expenses incurred in the Final Compensation Period, some fees and expenses might not be included in this Application

due to delays caused by accounting and processing during the Fee Period. CBCC reserves the right to make further application to this Court for allowance of such fees and expenses not included herein. Subsequent fee applications will be filed in accordance with the Bankruptcy Code, the Bankruptcy Rules, Local Bankruptcy Rules, the Retention Order, and the Interim Compensation Order.

WHEREFORE, CBCC respectfully requests (i) that the Court enter an order allowing CBCC's fees and expenses incurred during the Final Compensation Period in the total amount of \$497,997.75, which includes 100% of the fees incurred for reasonable and necessary professional services rendered by CBCC in the amount of \$494,650.37 and \$3,306.84 for actual and necessary costs and expenses, and (ii) that such fees and expenses be paid as administrative expenses of the Debtors' estates; and (iii) awarding CBCC such other and further relief that this Court deems just and proper.

Dated: August 30, 2024

/s/ Robert A. Weber

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Co-Counsel for the Liquidating Trustee

EXHIBIT A

Certification of Robert A. Weber

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In re:

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Debtor.

Chapter 11

Case No. 23-11947 (MEW)

**CERTIFICATION OF ROBERT A. WEBER REGARDING COMBINED
SIXTH MONTHLY FEE STATEMENT AND FINAL APPLICATION OF
CHIPMAN BROWN CICERO & COLE, LLP FOR COMPENSATION FOR
SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED
AS CO-COUNSEL TO THE DEBTORS AND DEBTORS IN POSSESSION FOR
THE (I) MONTHLY PERIOD FROM JUNE 1, 2024 THROUGH AND INCLUDING
JULY 31, 2024; AND FOR THE (II) FINAL PERIOD FROM
DECEMBER 13, 2023 THROUGH AND INCLUDING JULY 31, 2024**

Robert A. Weber, under penalty of perjury, certifies as follows:

1. I am an attorney admitted to practice before this Court, and a partner of the law firm of Chipman Brown Cicero & Cole, LLP (“CBCC”). CBCC is a Delaware limited liability partnership with its main office located at Hercules Plaza, 1313 North Market Street, Suite 5400, Wilmington, Delaware 19801. CBCC also maintains an office in New York at 501 Fifth Avenue, 15th Floor New York, New York 10017.

2. I make this certification in connection with the *Combined Sixth Monthly Fee Statement and Final Application of Chipman Brown Cicero & Cole, LLP for Compensation for Services Rendered and for Reimbursement of Expenses Incurred as Co-Counsel to the Debtors and Debtors in Possession for the (i) Monthly Period from June 1, 2024 through and Including July 31, 2024; and for the (ii) Final Period from December 13, 2023 through and Including July 31, 2024* (the “**Application**”) for final compensation and reimbursement of expenses in connection with CBCC’s representation of the Debtors in these Chapter 11 Cases.

3. I have read the Application and (a) to the best of my knowledge, information, and belief formed after reasonable inquiry, the fees and disbursements sought in the Application substantially comply in all material respects with the *Amended Guidelines for Fees and Disbursements for Professionals in Southern District of New York Bankruptcy Cases* (January 29, 2013) promulgated pursuant to Local Bankruptcy Rule 2016-1(a) (the “**Local Guidelines**”); (b) the fees and disbursements sought are billed at rates and in accordance with practices customarily employed by CBCC and generally accepted by CBCC’s clients; and (c) in providing a reimbursable service, CBCC does not make a profit on the service, whether the service is performed by the applicant in-house or through a third party.

4. With respect to section B.2 of the Local Guidelines, I certify that the Debtors have been provided on a monthly basis during the Final Compensation Period with statements of fees and out-of-pocket expenses, containing lists of professionals and paraprofessionals providing

services, their respective billing rates, the work hours expended by each individual, a general description of services rendered, a reasonably detailed breakdown of out-of-pocket expenses incurred, and an explanation of billing practices.

5. With respect to section B.3 of the Local Guidelines, I certify that the Application is being served on the U.S. Trustee, in addition to the Fee Notice Parties (as defined in the Interim Compensation Order).

6. With respect to section E of the Local Guidelines, CBCC provided the Debtors with voluntary reductions on its fees during the Final Compensation Period totaling \$8,665.63, as follows:

- (a) in CBCC's Second Monthly Fee Statement, the firm provided a voluntary reduction on its fees of \$7,948.75; and
- (b) in CBCC's Third Monthly Fee Statement, the firm provided a voluntary reduction on its fees of \$716.88.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: August 30, 2024

/s/ Robert A. Weber
Robert A. Weber

EXHIBIT B

Timekeeper Summary

**MONTHLY TIMEKEEPER SUMMARY FOR SERVICES RENDERED
FOR THE PERIOD FROM JUNE 1, 2024 THROUGH JULY 31, 2024**

NAME OF PROFESSIONAL INDIVIDUAL	POSITION, YEAR OF OBTAINING RELEVANT LICENSE TO PRACTICE	HOURLY BILLING RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Adam D. Cole	Partner; Member of the New York Bar since 1991	\$795.00	5.7	\$4,531.50
Robert A. Weber	Partner; Member of the Delaware Bar since 2000	\$775.00	59.3	\$45,957.50
Melissa Chernofsky	Partner; Member of the New York Bar since 2001	\$575.00	6.3	\$3,622.50
Kristi J. Doughty	Counsel; Member of the New Jersey and Pennsylvania Bars since 1987; Member of the Delaware Bar since 1999	\$475.00	19.4	\$9,215.00
Michelle M. Dero	Paralegal	\$300.00	16.8	\$5,040.00
Renae Fusco	Paralegal	\$300.00	0.6	\$180.00
TOTAL HOURS/ FEES FOR ATTORNEYS AND PARAPROFESSIONALS:			108.1	\$68,546.50

**FINAL TIMEKEEPER SUMMARY FOR SERVICES RENDERED FOR
THE PERIOD FROM DECEMBER 13, 2023 THROUGH JULY 31, 2024**

NAME OF PROFESSIONAL INDIVIDUAL	POSITION, YEAR OF OBTAINING RELEVANT LICENSE TO PRACTICE	HOURLY BILLING RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
Adam D. Cole	Partner; Member of the New York Bar since 1991	\$775.00	20.2	\$15,655.00
		\$795.00	48.3	\$38,398.50
ADC TOTAL:			68.5	\$54,053.50
Robert A. Weber	Partner; Member of the Delaware Bar since 2000	\$725.00	44.8	\$32,480.00
		\$775.00	406.3	\$312,228.12
RAW TOTAL:			451.1	\$344,708.12
Mark L. Desgrosseilliers	Partner; Member of the Delaware Bar since 2001	\$750.00	0.2	\$150.00
Mark D. Olivere	Partner; Member of the Delaware Bar since 2002	\$525.00	0.2	\$105.00
		\$550.00	38.0	\$20,900.00
MDO TOTAL:			38.2	\$21,005.00
Melissa R. Chernofsky	Partner; Member of the New York Bar since 2002	\$575.00	6.3	\$3,622.50
Kristi J. Doughty	Counsel; Member of the New Jersey and Pennsylvania Bars since 1987; Member of the Delaware Bar since 1999	\$475.00	85.8	\$36,171.25
Mariska Suparman	Associate; Member of the Delaware Bar since 2023	\$350.00	13.7	\$4,795.00
Michelle M. Dero	Paralegal	\$275.00	12.1	\$3,327.50
		\$300.00	82.5	\$17,850.00
MMD TOTAL:			94.6	\$21,177.50
Renaë Fusco	Paralegal	\$275.00	3.1	\$852.50
		\$300.00	7.3	\$1,740.00
RF TOTAL:			10.4	\$2,592.50
Lauren Hitchens	Administrative Assistant	\$250.00	1.5	\$375.00
TOTAL HOURS/ FEES FOR ATTORNEYS AND PARAPROFESSIONALS:			108.1	\$68,546.50

EXHIBIT C

**MONTHLY COMPENSATION BY WORK TASK CODE FOR THE
PERIOD FROM JUNE 1, 2024 THROUGH JULY 31, 2024**

TASK CODE/DESCRIPTION	TOTAL HOURS	TOTAL FEES
B110 Case Administration	1.5	\$735.00
B120 Asset Analysis and Recovery	0.0	\$0.00
B130 Asset Disposition	0.0	\$0.00
B140 Relief from Stay/Adequate Protection Proceeding	12.2	\$9,481.00
B150 Meetings of and Communications with Creditors	0.0	\$0.00
B160 Fee/Employment Applications	14.2	\$7,680.00
B170 Fee/Employment Objections	2.9	\$1,962.50
B180 Avoidance Action Analysis	0.0	\$0.00
B185 Assumption/Rejection of Leases and Contracts	27.5	\$14,020.00
B190 Other Contested Matters (excluding assumption/rejection motions)	2.0	\$885.00
B195 Non-Working Travel	0.0	\$0.00
B200 Operations	0.0	\$0.00
B210 Business Operations	0.0	\$0.00
B220 Employee Benefits/Pension	0.0	\$0.00
B230 Financing/Cash Collateral	15.6	\$10,438.00
B240 Tax Issues	0.0	\$0.00
B250 Real Estate	0.0	\$0.00
B260 Board of Director Matters	6.3	\$3,622.50
B300 Claims and Plan	0.0	\$0.00
B310 Claims Administration and Objections	0.9	\$559.00
B320 Plan and Disclosure Statement (including business plan)	10.7	\$8,081.00
B400 Bankruptcy-Related Advice	0.0	\$0.00
B410 General Bankruptcy Advice/Opinions	0.0	\$0.00
B420 Restructurings	0.0	\$0.00
L140 Document/File Management	0.5	\$387.50
L150 Budgeting	0.2	\$155.00
L160 Settlement/Non-Binding ADR	11.8	\$9,145.00
L450 Trial and Hearing Attendance	1.8	\$1,395.00
TOTAL:	108.10	\$68,546.50

**FINAL COMPENSATION BY WORK TASK CODE FOR THE
PERIOD FROM DECEMBER 13, 2023 THROUGH JULY 31, 2024**

TASK CODE/DESCRIPTION	TOTAL HOURS	TOTAL FEES
B110 Case Administration	74.3	\$37,934.25
B120 Asset Analysis and Recovery	0.0	\$0.00
B130 Asset Disposition	0.0	\$0.00
B140 Relief from Stay/Adequate Protection Proceeding	204.2	\$142,968.50
B150 Meetings of and Communications with Creditors	4.0	\$3,005.00
B160 Fee/Employment Applications	86.2	\$41,659.00
B170 Fee/Employment Objections	2.9	\$1,962.50
B180 Avoidance Action Analysis	0.5	\$387.50
B185 Assumption/Rejection of Leases and Contracts	104.7	\$60,150.00
B190 Other Contested Matters (excluding assumption/rejection motions)	41.5	\$24,394.00
B195 Non-Working Travel	0.0	\$0.00
B200 Operations	0.0	\$0.00
B210 Business Operations	12.1	\$9,403.50
B220 Employee Benefits/Pension	9.1	\$6,292.50
B230 Financing/Cash Collateral	98.9	\$74,357.62
B240 Tax Issues	0.0	\$0.00
B250 Real Estate	0.0	\$0.00
B260 Board of Director Matters	6.3	\$3,622.50
B300 Claims and Plan	0.0	\$0.00
B310 Claims Administration and Objections	28.1	\$17,509.50
B320 Plan and Disclosure Statement (including business plan)	42.4	\$31,081.00
B400 Bankruptcy-Related Advice	0.0	\$0.00
B410 General Bankruptcy Advice/Opinions	8.5	\$6,727.50
B420 Restructurings	0.0	\$0.00
JM Hearings	2.7	\$1,395.00
L120 Analysis/Strategy	2.0	\$1,578.00
L140 Document/File Management	0.5	\$387.50
L150 Budgeting	0.5	\$387.50
L160 Settlement/Non-Binding ADR	20.3	\$15,732.50
L450 Trial and Hearing Attendance	2.1	\$1,627.50
P250 Employee/Labor	18.6	\$12,087.50
TOTAL:	770.40	\$494,650.37

EXHIBIT D

**EXPENSE SUMMARY FOR THE MONTHLY PERIOD
JUNE 1, 2024 THROUGH JULY 31, 2024**

EXPENSE CATEGORY	SERVICE PROVIDER (IF APPLICABLE)	TOTAL EXPENSES
E105 Telephone	CourtSolutions	\$140.00
E107 Delivery Services/Messengers	Reliable	\$300.06
E108 Postage	Reliable	\$25.80
TOTAL:		\$465.86

**EXPENSE SUMMARY FOR THE FINAL PERIOD
DECEMBER 13, 2023 THROUGH JULY 31, 2024**

EXPENSE CATEGORY	SERVICE PROVIDER (IF APPLICABLE)	TOTAL EXPENSES
E101 Copying	In-House Copies	\$144.06
E102 Outside Printing	Reliable	\$163.73
E105 Telephone	CourtSolutions	\$490.00
E106 Online Research	Westlaw	\$0.08
E107 Delivery Services/Messengers	Reliable	\$1,456.08
E108 Postage	Reliable; Federal Express	\$782.89
E112 Court Fees	Pay.Gov	\$200.00
E123 Other Professionals	CourtSolutions	\$70.00
TOTAL:		\$3,306.84

EXHIBIT E

Date	Timekeeper	Activity	Description	Hours	Rate	Discount	Total Fees
06.06.2024	RAW	B110 Case Administration	Review and circulate recent filings	0.30	\$775.00	\$0.00	\$232.50
06.11.2024	RAW	B110 Case Administration	Communications with P. Keenan and R. Sainvil regarding update from chambers concerning 9019 motion and order	0.20	\$775.00	\$0.00	\$155.00
06.26.2024	MMD	B110 Case Administration	Review June 28 agenda and register R. Weber for hearing	0.30	\$300.00	\$0.00	\$90.00
06.27.2024	MMD	B110 Case Administration	Run additional conflict check, prepare report and followup with R. Weber and A. Cole	0.40	\$300.00	\$0.00	\$120.00
06.28.2024	MMD	B110 Case Administration	Retrieve amended agenda notice for today's hearing and email same to R. Weber	0.10	\$300.00	\$0.00	\$30.00
07.17.2024	RAW	B110 Case Administration	Communications with BofA's counsel regarding case status	0.10	\$775.00	\$0.00	\$77.50
07.29.2024	MMD	B110 Case Administration	Retrieve Notice of Status Conference and email same to A. Cole and R. Weber; Register appearance for R. Weber's attendance	0.10	\$300.00	\$0.00	\$30.00
			B110 TOTAL:	1.50		\$0.00	\$735.00
06.02.2024	RAW	B140 Relief from Stay/Adequate Protection Proceedings	Review and analysis of stay relief motion	2.30	\$775.00	\$0.00	\$1,782.50
06.03.2024	RAW	B140 Relief from Stay/Adequate Protection Proceedings	Attend call with counsel for CNA Insurance and R. Sainvil to discuss stay relief motion procedure and related issues (.6); Follow-up with R. Sainvil (.3)	0.90	\$775.00	\$0.00	\$697.50
06.03.2024	RAW	B140 Relief from Stay/Adequate Protection Proceedings	Prepare for call with counsel for CNA Insurance and R. Sainvil to discuss stay relief motion	0.60	\$775.00	\$0.00	\$465.00
06.03.2024	RAW	B140 Relief from Stay/Adequate Protection Proceedings	Review stay relief motion and research regarding issues raised	1.60	\$775.00	\$0.00	\$1,240.00
06.04.2024	RAW	B140 Relief from Stay/Adequate Protection Proceedings	Communications with co-counsel and client regarding stay relief motion	1.20	\$775.00	\$0.00	\$930.00
06.04.2024	ADC	B140 Relief from Stay/Adequate Protection Proceedings	Telephone call with R. Weber regarding automatic stay issues regarding insurance companies	0.30	\$795.00	\$0.00	\$238.50
06.05.2024	RAW	B140 Relief from Stay/Adequate Protection Proceedings	Prepare for/attend call with B. Bell regarding insurance matters and follow-up regarding same with client and co-counsel (.9); Telephone call and emails with movants' counsel (.8); Communications with client and co-counsel (.9)	2.60	\$775.00	\$0.00	\$2,015.00
06.06.2024	RAW	B140 Relief from Stay/Adequate Protection Proceedings	Communications with insurance counsel regarding stay relief motion	0.40	\$775.00	\$0.00	\$310.00
06.10.2024	RAW	B140 Relief from Stay/Adequate Protection Proceedings	Emails with H. Light P. Keenan and R. Sainvil regarding stay relief motion	0.30	\$775.00	\$0.00	\$232.50
06.10.2024	RAW	B140 Relief from Stay/Adequate Protection Proceedings	Telephone call with H. Light P. Keenan A. Cole and R. Sainvil to discuss insurer stay relief motion	0.30	\$775.00	\$0.00	\$232.50
06.10.2024	ADC	B140 Relief from Stay/Adequate Protection Proceedings	Telephone call with H. Light R. Weber and R. Sainvil regarding insurer stay issues	1.00	\$795.00	\$0.00	\$795.00
06.10.2024	RAW	B140 Relief from Stay/Adequate Protection Proceedings	Telephone call with H. Light, P. Keenan, A. Cole and R. Sainvil to discuss Brazilian insolvency proceedings and Brazil banks' litigation	0.40	\$775.00	\$0.00	\$310.00
06.24.2024	RAW	B140 Relief from Stay/Adequate Protection Proceedings	Review stipulation resolving insurers' stay relief motion	0.30	\$775.00	\$0.00	\$232.50
			B140 TOTAL:	12.20		\$0.00	\$9,481.00

Date	Timekeeper	Activity	Description	Hours	Rate	Discount	Total Fees
06.03.2024	MMD	B160 Fee/Employment Applications	Review email message from R. Weber regarding additional interested parties and prepare report concerning same	0.30	\$300.00	\$0.00	\$90.00
06.04.2024	MMD	B160 Fee/Employment Applications	Review email message from R. Weber regarding potentially interested parties and reply to same with information	0.20	\$300.00	\$0.00	\$60.00
06.14.2024	MMD	B160 Fee/Employment Applications	Prepare CBCC's fifth monthly application and related exhibits	2.00	\$300.00	\$0.00	\$600.00
06.14.2024	RAW	B160 Fee/Employment Applications	Communications with R. Sainvil regarding April fee applications	0.20	\$775.00	\$0.00	\$155.00
06.14.2024	RAW	B160 Fee/Employment Applications	Review and provide comments to May fee statement (.3); Communicate with M. Dero regarding same (.2)	0.50	\$775.00	\$0.00	\$387.50
06.14.2024	RAW	B160 Fee/Employment Applications	Communications with Riveron regarding fee summary (.2); Prepare fee summary requested by Riveron (.3)	0.50	\$775.00	\$0.00	\$387.50
06.14.2024	MMD	B160 Fee/Employment Applications	Review R. Weber's message regarding fee application and revise same (.4); Finalize, file and serve same (.3); Review R. Weber's message regarding supplementing retention application (.1); Prepare supplemental declaration for review (.3)	1.10	\$300.00	\$0.00	\$330.00
06.19.2024	RAW	B160 Fee/Employment Applications	Review and revise supplemental disclosure declaration	0.30	\$775.00	\$0.00	\$232.50
06.19.2024	MMD	B160 Fee/Employment Applications	Review email message from R. Weber attaching revised supplemental declaration, save and update declaration and chart identifying potential conflicts (1.0); Emails with R. Weber regarding further review of declaration, conflict reports and Euler Hermes (.2); Prepare conflict report regarding Euler Hermes North America Insurance Company (.2)	1.40	\$300.00	\$0.00	\$420.00
06.27.2024	RAW	B160 Fee/Employment Applications	Calls with H. Light, J. Dodd and Committee counsel regarding UST verbal request for holdback to be presented at June 28 hearing (.9); Research regarding same (1.3); Prepare for argument on such request (1.5)	3.70	\$775.00	\$0.00	\$2,867.50
06.28.2024	MMD	B160 Fee/Employment Applications	Retrieve <i>Order Granting First Applications for Allowance of Interim Compensation and Reimbursement of Expenses</i> and email same to A. Cole and R. Weber	0.10	\$300.00	\$0.00	\$30.00
07.08.2024	MMD	B160 Fee/Employment Applications	Emails with CBCC team regarding June application (.1); Prepare CBCC's sixth monthly application and related exhibits (1.0) and email same to R. Weber for review (.1)	1.20	\$300.00	\$0.00	\$360.00
07.09.2024	RAW	B160 Fee/Employment Applications	Communications with co-counsel regarding status of interim fee application, final fee applications and related matters	0.30	\$775.00	\$0.00	\$232.50
07.09.2024	RAW	B160 Fee/Employment Applications	Review and provide comments to draft June fee application	0.40	\$775.00	\$0.00	\$310.00
07.10.2024	MMD	B160 Fee/Employment Applications	Review email messages from R. Weber regarding comments to CBCC's sixth monthly application and related exhibits and revise same	0.50	\$300.00	\$0.00	\$150.00
07.10.2024	RAW	B160 Fee/Employment Applications	Review updated June application and check docket (.2); Follow-up with Baker McKenzie (.1) and M. Dero (.1) regarding scheduling	0.40	\$775.00	\$0.00	\$310.00
07.16.2024	RAW	B160 Fee/Employment Applications	Review information regarding payments from Mercon (.1); Follow-up with M. Dero regarding same (.1)	0.20	\$775.00	\$0.00	\$155.00
07.17.2024	MMD	B160 Fee/Employment Applications	Review email message from R. Weber regarding payment received from Debtors and reply to same	0.10	\$300.00	\$0.00	\$30.00
07.17.2024	RAW	B160 Fee/Employment Applications	Communications with Baker McKenzie regarding fee payments and other matters	0.20	\$775.00	\$0.00	\$155.00
07.17.2024	MMD	B160 Fee/Employment Applications	Review email message from R. Weber regarding outstanding fee applications due and reply to same	0.10	\$300.00	\$0.00	\$30.00
07.18.2024	RAW	B160 Fee/Employment Applications	Reconcile July fee payment against amounts owed (.4); Follow-up with co-counsel and internal personnel (.1)	0.50	\$775.00	\$0.00	\$387.50
			B160 TOTAL:	14.20		\$0.00	\$7,680.00

Date	Timekeeper	Activity	Description	Hours	Rate	Discount	Total Fees
06.17.2024	MMD	B170 Fee/Employment Objections	Review email messages between UST and R. Weber regarding follow-up on certain time entries and extending response deadline and update calendar	0.10	\$300.00	\$0.00	\$30.00
06.18.2024	RAW	B170 Fee/Employment Objections	Communications with UST's office regarding request for extension of time to respond to CBCC's first interim fee application (.1); Communication with P. Keenan and H. Light regarding U.S. Trustee's fee application response deadline and related matters (.1)	0.20	\$775.00	\$0.00	\$155.00
06.19.2024	RAW	B170 Fee/Employment Objections	Settlement communications with UST's office regarding resolution of CBCC's first interim fee application	0.30	\$775.00	\$0.00	\$232.50
06.19.2024	MMD	B170 Fee/Employment Objections	Review email message from R. Weber to UST regarding CBCC's first interim fee request	0.10	\$300.00	\$0.00	\$30.00
06.20.2024	RAW	B170 Fee/Employment Objections	Communications with UST, client and cocounsel regarding resolution of UST's concerns on interim fee application (.4); Review and revise supplemental disclosure declaration (.8)	1.20	\$775.00	\$0.00	\$930.00
06.20.2024	MMD	B170 Fee/Employment Objections	Review email messages between R. Weber and UST regarding CBCC's first interim application	0.10	\$300.00	\$0.00	\$30.00
06.24.2024	RAW	B170 Fee/Employment Objections	Telephone call from H. Light regarding resolution of UST's interim fee application concerns and request for additional holdback	0.20	\$775.00	\$0.00	\$155.00
06.25.2024	MMD	B170 Fee/Employment Objections	Review email message from R. Weber attaching proposed first interim order (.1); Review numbers against CBCC's first interim application and reply to same (.1)	0.20	\$300.00	\$0.00	\$60.00
06.26.2024	RAW	B170 Fee/Employment Objections	Emails with D. Rudewicz R. Sainvil and H. Light regarding UST's request for additional hold-back of professional fees	0.40	\$775.00	\$0.00	\$310.00
06.26.2024	MMD	B170 Fee/Employment Objections	Review email messages between UST and R. Weber regarding interim fees	0.10	\$300.00	\$0.00	\$30.00
			B170 TOTAL:	2.90		\$0.00	\$1,962.50
06.03.2024	RAW	B185 Assumption/Rejection of Leases and Contracts	Revise and update schedule for fourth rejection notice (.3); Communicate with client team regarding same (.1)	0.40	\$775.00	\$0.00	\$310.00
06.03.2024	RAW	B185 Assumption/Rejection of Leases and Contracts	Communications with client team regarding rejection notice, Coyote warehouse, Keurig and other collections/settlement matters	0.40	\$775.00	\$0.00	\$310.00
06.04.2024	RAW	B185 Assumption/Rejection of Leases and Contracts	Communications with client team regarding fourth rejection notice	0.20	\$775.00	\$0.00	\$155.00
06.04.2024	MMD	B185 Assumption/Rejection of Leases and Contracts	Email messages from/to R. Weber regarding fourth omnibus rejection notice (.1); Review email messages between R. Weber and L. Chamorro regarding rejection dates and update schedule (.2); Finalize and file <i>Debtors' Fourth Omnibus Notice of Rejection of Certain Executory Contracts and/or Unexpired Leases</i> (.2), attention to service (.1) and calendaring deadlines (.1)	0.70	\$300.00	\$0.00	\$210.00
06.04.2024	RAW	B185 Assumption/Rejection of Leases and Contracts	Communications with client team regarding rejection notices additional contracts and related matters	0.80	\$775.00	\$0.00	\$620.00
06.06.2024	RAW	B185 Assumption/Rejection of Leases and Contracts	Communications with F. Cottrell regarding additional contract rejections	0.30	\$775.00	\$0.00	\$232.50
06.07.2024	RAW	B185 Assumption/Rejection of Leases and Contracts	Emails with F. Cottrell H. Walsh and H. Light regarding upcoming rejections of contracts (.4); Review and circulate to clients form of rejection notice and schedule (.1); Review plan treatment of contracts and follow-up with R. Sainvil and H. Light regarding Agrosavia contract (.2)	0.70	\$775.00	\$0.00	\$542.50
06.07.2024	MMD	B185 Assumption/Rejection of Leases and Contracts	Review email message from R. Weber regarding additional contracts for rejection (.1); Prepare fifth notice of rejection of contracts and update schedule and email same to R. Weber for review/comment (.2)	0.30	\$300.00	\$0.00	\$90.00

Date	Timekeeper	Activity	Description	Hours	Rate	Discount	Total Fees
06.19.2024	RAW	B185 Assumption/Rejection of Leases and Contracts	Review landlord objection to fourth omnibus rejection notice (.2); Review rejection procedures order (.2); Instruct M. Dero to prepare certificate of no objection and revised form of order and rejected contract exhibit (.1); Communications with client team and cocounsel regarding same (.3); Instruct K. Doughty regarding preparation of response to objection (.2); Review and revise certificate of no objection for fourth rejection notice (.2); Communicate with M. Dero regarding revisions and filing of same (.1)	1.30	\$775.00	\$0.00	\$1,007.50
06.19.2024	MMD	B185 Assumption/Rejection of Leases and Contracts	Review email message from R. Weber regarding Terra's objection to fourth rejection notice (.1); Update/revise as-filed schedule and prepare comparison (.2); Prepare certificate of no objection and proposed order (.3); Prepare notice of hearing (.1)	0.70	\$300.00	\$0.00	\$210.00
06.19.2024	MMD	B185 Assumption/Rejection of Leases and Contracts	Review email message from R. Weber regarding revised certificate of no objection, save same and organize exhibits (.3); Finalize and file <i>Certificate of No Objection in Support of Order Approving Debtors' Fourth Omnibus Rejection Notice</i> (.2)	0.50	\$300.00	\$0.00	\$150.00
06.19.2024	KJD	B185 Assumption/Rejection of Leases and Contracts	Exchange emails with R. Weber regarding assignment to prepare response to the objection to motion to reject Guatemala lease	0.10	\$475.00	\$0.00	\$47.50
06.20.2024	MMD	B185 Assumption/Rejection of Leases and Contracts	Email message to Judge Wiles' chambers attaching (i) Certificate of No Objection; (i) proposed Order Approving Debtors' Fourth Omnibus Rejection of Executory Contracts and Unexpired Leases; and (iii) Schedule 1	0.10	\$300.00	\$0.00	\$30.00
06.20.2024	RF	B185 Assumption/Rejection of Leases and Contracts	Pull sample reply for K. Doughty	0.20	\$300.00	\$0.00	\$60.00
06.20.2024	KJD	B185 Assumption/Rejection of Leases and Contracts	Additional research of business judgment rule caselaw (1.3); Review emails with additional facts (.1)	1.40	\$475.00	\$0.00	\$665.00
06.21.2024	RAW	B185 Assumption/Rejection of Leases and Contracts	Communications with client team regarding landlord objection to rejection notice and response to same (.2); Review order approving amended fourth rejection notice (.1); Analysis of issues for response to objecting creditor (.3)	0.60	\$775.00	\$0.00	\$465.00
06.21.2024	RF	B185 Assumption/Rejection of Leases and Contracts	Search docket regarding response and emails with K. Doughty regarding same	0.40	\$300.00	\$0.00	\$120.00
06.21.2024	KJD	B185 Assumption/Rejection of Leases and Contracts	Review emails with additional information on Guatemala lease and objection, review docket (.2) and emails with R. Weber regarding Guatemala objection to rejection of lease and landlord (.2); Review additional cases on business judgment rule (1.4); Begin draft response to objection to lease rejection (2.9)	4.70	\$475.00	\$0.00	\$2,232.50
06.24.2024	KJD	B185 Assumption/Rejection of Leases and Contracts	Research and review cases regarding rejection of leases and business judgment rule (3.1); Revise response to objection (2.8)	5.90	\$475.00	\$0.00	\$2,802.50
06.25.2024	KJD	B185 Assumption/Rejection of Leases and Contracts	Review cases (.7); Draft/revise objection to rejection of Guatemalan lease (1.1)	1.80	\$475.00	\$0.00	\$855.00
06.26.2024	KJD	B185 Assumption/Rejection of Leases and Contracts	Additional research and review of cases regarding lease rejection and business judgment rule (.8); Draft client declaration (1.1); Revise response to rejection objection (2.9); Request paralegal to run keycite report and email to R. Weber. (.1)	5.00	\$475.00	\$0.00	\$2,375.00
06.27.2024	KJD	B185 Assumption/Rejection of Leases and Contracts	Review Keycite report and perform additional research (.3); Revise response and email to R. Weber (.2)	0.50	\$475.00	\$0.00	\$237.50
07.23.2024	MMD	B185 Assumption/Rejection of Leases and Contracts	Review email message from to R. Weber from 999 Ponce LLC regarding leases (.1); Review rejection notices and leases and reply to same regarding findings (.1)	0.20	\$300.00	\$0.00	\$60.00

Date	Timekeeper	Activity	Description	Hours	Rate	Discount	Total Fees
07.23.2024	RAW	B185 Assumption/Rejection of Leases and Contracts	Communications with R. Sainvil and J.P. Ibarra regarding Miami lease issue	0.30	\$775.00	\$0.00	\$232.50
			B185 TOTAL:	27.50		\$0.00	\$14,020.00
06.03.2024	RAW	B190 Other Contested Matters (excluding assumption/rejection motions)	Review signed settlement agreement (.1); Email with client team regarding additional settlement approval notice (.1)	0.20	\$775.00	\$0.00	\$155.00
06.06.2024	MMD	B190 Other Contested Matters (excluding assumption/rejection motions)	Review email message from R. Weber regarding settlement procedures order and reply to same attaching certificate of no objection	0.10	\$300.00	\$0.00	\$30.00
06.20.2024	MMD	B190 Other Contested Matters (excluding assumption/rejection motions)	Review email messages from R. Weber regarding document production (.1); Download and organize emails and documents being produced (.8); Add Bates labels to production documents and email same to A. Cole and R. Weber (.2)	1.10	\$300.00	\$0.00	\$330.00
07.09.2024	RAW	B190 Other Contested Matters (excluding assumption/rejection motions)	Communications with Luiz Guilherme Coelho regarding Expocaccer dispute and strategy	0.40	\$775.00	\$0.00	\$310.00
07.17.2024	MMD	B190 Other Contested Matters (excluding assumption/rejection motions)	Review email message from R. Weber regarding Cottonwood Coffee's SubV bankruptcy in South Dakota (.1); Retrieve docket and email same to R. Weber and calendar relevant deadlines (.1)	0.20	\$300.00	\$0.00	\$60.00
			B190 TOTAL:	2.00		\$0.00	\$885.00
06.05.2024	MMD	B230 Financing/Cash Collections	Review email message from R. Weber regarding settlements and prepare second omnibus settlement motion	0.70	\$300.00	\$0.00	\$210.00
06.07.2024	MMD	B230 Financing/Cash Collections	Prepare certificate of no objection regarding first omnibus motion approving accounts receivable settlements and update proposed order (.2); Review Local Rule 9075-2 regarding deadline to file certificates of no objection (.1)	0.30	\$300.00	\$0.00	\$90.00
06.08.2024	MMD	B230 Financing/Cash Collections	Efile <i>Certificate of No Objection Regarding Debtors' First Omnibus Motion to Approve Accounts Receivable Settlements</i> (.2); Email message to Judge Wiles' chambers attaching certificate of no objection and proposed order (.1)	0.30	\$300.00	\$0.00	\$90.00
06.10.2024	RAW	B230 Financing/Cash Collections	Revise settlement agreement with Atlantic Droga (.3); Follow-up communications with H. Walsh regarding Atlantic Droga settlement (.1)	0.40	\$775.00	\$0.00	\$310.00
06.10.2024	ADC	B230 Financing/Cash Collections	Telephone call with SBUX counsel and R. Weber regarding setoff and stay relief issues	0.20	\$795.00	\$0.00	\$159.00
06.10.2024	ADC	B230 Financing/Cash Collections	Follow-up telephone call with R. Weber regarding SBUX setoff and stay relief issues	0.20	\$795.00	\$0.00	\$159.00
06.12.2024	MMD	B230 Financing/Cash Collections	Review email messages between L. Echevarria, Judge Wiles chambers, and R. Weber regarding Proposed First Omnibus Order Approving Accounts Receivable Settlements	0.10	\$300.00	\$0.00	\$30.00
06.12.2024	MMD	B230 Financing/Cash Collections	Retrieve <i>First Omnibus Order Approving Accounts Receivable Settlements</i> and emails with Kroll regarding service of same	0.10	\$300.00	\$0.00	\$30.00
06.12.2024	RAW	B230 Financing/Cash Collections	Review information from client team regarding additional settlements	0.20	\$775.00	\$0.00	\$155.00
06.21.2024	RAW	B230 Financing/Cash Collections	Communications with H. Walsh, H. Light and M. Dero regarding additional collections matters	0.40	\$775.00	\$0.00	\$310.00
06.21.2024	MMD	B230 Financing/Cash Collections	Review email message from R. Weber regarding whether demand letters were sent to (i) Allan's; (ii) Culture and Coffee; and (iii) Cotton Wood and reply to same (.1); Prepare conflict report as to Allan's and Cotton Wood and email same to R. Weber (.1)	0.20	\$300.00	\$0.00	\$60.00

Date	Timekeeper	Activity	Description	Hours	Rate	Discount	Total Fees
06.21.2024	MMD	B230 Financing/Cash Collections	Prepare demand letters for Allan's Coffee and Cottonwood Coffee and email same to R. Weber for review/comment	0.30	\$300.00	\$0.00	\$90.00
06.21.2024	MMD	B230 Financing/Cash Collections	Email messages from/to R. Weber regarding demand letters	0.10	\$300.00	\$0.00	\$30.00
06.24.2024	MMD	B230 Financing/Cash Collections	Review email messages between R. Weber and H. Walsh regarding demand letters (.1); Update demand letters to (i) Allan's Coffee & Tea and (ii) Cottonwood Coffee and email same to R. Weber for final review (.2)	0.30	\$300.00	\$0.00	\$90.00
06.24.2024	MMD	B230 Financing/Cash Collections	Email demand letter to Allan's Coffee & Tea (.1); Email demand letter to Cottonwood Coffee (.1); Emails with Reliable regarding sending demand letters via FedEx (.1)	0.30	\$300.00	\$0.00	\$90.00
06.24.2024	RAW	B230 Financing/Cash Collections	Review and approve updated demand letter to Allans Coffee (.1); Review and approve updated demand letter to Cottonwood Coffee (.1)	0.20	\$775.00	\$0.00	\$155.00
06.25.2024	RAW	B230 Financing/Cash Collections	Communications with H. Walsh and H. Light regarding various collections matters (.4); Telephone call with R. Sainvil regarding collections and plan confirmation matters (.3)	0.70	\$775.00	\$0.00	\$542.50
06.27.2024	RAW	B230 Financing/Cash Collections	Review and analyze notice of preservation filed by Keurig regarding recoupment and setoff rights and related proofs of claim (.9); Follow-up communications with H. Light and H. Walsh regarding A/R settlements credit insurance and related matters (1.0)	1.90	\$775.00	\$0.00	\$1,472.50
06.27.2024	MMD	B230 Financing/Cash Collections	Review email message from R. Weber regarding certificate of no objection (.1); Review additional emails attaching settlement agreements (.1); Prepare, finalize and file <i>Certificate of No Objection in Support of Second Omnibus Order Approving A/R Settlements</i> (.4); Email same to chambers (.1)	0.70	\$300.00	\$0.00	\$210.00
06.28.2024	MMD	B230 Financing/Cash Collections	Retrieve Second Omnibus Order Approving A/R Settlements and email same to A. Cole and R. Weber (.1); Emails with Kroll regarding service of order (.1)	0.20	\$300.00	\$0.00	\$60.00
07.10.2024	RAW	B230 Financing/Cash Collections	Prepare for/attend call with H. Walsh and A. Cole regarding collections matters	0.80	\$775.00	\$0.00	\$620.00
07.10.2024	ADC	B230 Financing/Cash Collections	Telephone call with M. Kirschner, H. Walsh and R. Weber regarding AR and setoff issues	0.40	\$795.00	\$0.00	\$318.00
07.10.2024	ADC	B230 Financing/Cash Collections	Follow-up telephone call with R. Weber regarding telephone call with liquidating trustee	0.20	\$795.00	\$0.00	\$159.00
07.12.2024	RAW	B230 Financing/Cash Collections	Emails with client team regarding collections and other matters	0.20	\$775.00	\$0.00	\$155.00
07.12.2024	RAW	B230 Financing/Cash Collections	Prepare for/attend settlement discussions call with counsel for SBUX (.7); Follow-up communications with A. Cole and client team (.6)	1.30	\$775.00	\$0.00	\$1,007.50
07.12.2024	ADC	B230 Financing/Cash Collections	Telephone call with R. Weber and SBUX counsel regarding potential settlement issues	0.40	\$795.00	\$0.00	\$318.00
07.12.2024	ADC	B230 Financing/Cash Collections	Follow up call with R. Weber regarding settlement call with SBUX counsel	0.20	\$795.00	\$0.00	\$159.00
07.14.2024	RAW	B230 Financing/Cash Collections	Communications with H. Walsh regarding status of Keurig collections matter	0.20	\$775.00	\$0.00	\$155.00
07.15.2024	ADC	B230 Financing/Cash Collections	Telephone call with M. Kirschner and R. Weber regarding AR issues (.4); Follow-up call with R. Weber (.4); Follow-up call with M. Kirschner and R. Weber (.2)	1.00	\$795.00	\$0.00	\$795.00
07.16.2024	RAW	B230 Financing/Cash Collections	Communications with client regarding updated AR information	0.20	\$775.00	\$0.00	\$155.00
07.16.2024	RAW	B230 Financing/Cash Collections	Emails telephone call with H. Walsh regarding settlement negotiations with AR counterparties	0.50	\$775.00	\$0.00	\$387.50
07.17.2024	RAW	B230 Financing/Cash Collections	Communications with client team regarding multiple collection matters	0.40	\$775.00	\$0.00	\$310.00
07.17.2024	RAW	B230 Financing/Cash Collections	Telephone call with H. Walsh regarding settlement strategy (.2); Follow-up with A. Cole regarding same (.1)	0.30	\$775.00	\$0.00	\$232.50

Date	Timekeeper	Activity	Description	Hours	Rate	Discount	Total Fees
07.18.2024	RAW	B230 Financing/Cash Collections	Prepare for/attend call with counsel for AR counterparty regarding settlement negotiations (.4); Follow-up with client team regarding same (.1)	0.50	\$775.00	\$0.00	\$387.50
07.18.2024	ADC	B230 Financing/Cash Collections	Telephone call with SBUX counsel regarding AR issues	0.20	\$795.00	\$0.00	\$159.00
07.18.2024	ADC	B230 Financing/Cash Collections	Telephone call with R. Weber regarding SBUX AR issues	0.10	\$795.00	\$0.00	\$79.50
07.23.2024	RAW	B230 Financing/Cash Collections	Review emails between landlord and co-counsel regarding Florida property (.2); Research prior rejection notices for Florida property (.2); Follow-up with co-counsel (.1)	0.50	\$775.00	\$0.00	\$387.50
07.25.2024	RAW	B230 Financing/Cash Collections	Review and provide comments to H. Walsh on draft settlement proposal	0.40	\$775.00	\$0.00	\$310.00
			B230 TOTAL:	15.60		\$0.00	\$10,438.00
07.12.2024	MC	B260 Board of Directors Matters	Attend meeting of proposed litigation trust board	1.60	\$575.00	\$0.00	\$920.00
07.12.2024	MC	B260 Board of Directors Matters	Preliminary review of governance provisions of trust agreement	0.50	\$575.00	\$0.00	\$287.50
07.16.2024	MC	B260 Board of Directors Matters	Prepare invitation and agenda for proposed litigation trust board meeting	0.40	\$575.00	\$0.00	\$230.00
07.18.2024	MC	B260 Board of Directors Matters	Attend meeting of proposed litigation trust board	1.40	\$575.00	\$0.00	\$805.00
07.24.2024	MC	B260 Board of Directors Matters	Communicate with M. Kirschner and proposed Board regarding current status and next meeting	0.90	\$575.00	\$0.00	\$517.50
07.31.2024	MC	B260 Board of Directors Matters	Prepare for and attend proposed litigation trust board meeting	1.50	\$575.00	\$0.00	\$862.50
			B260 TOTAL:	6.30		\$0.00	\$3,622.50
06.27.2024	MMD	B310 Claims Administration and Objections	Emails with R. Weber regarding Keurig Trading's proofs of claim and retrieve same	0.30	\$300.00	\$0.00	\$90.00
07.24.2024	ADC	B310 Claims Administration and Objections	Telephone call with Liquidating Trustee regarding potential claim objections	0.20	\$795.00	\$0.00	\$159.00
07.26.2024	RAW	B310 Claims Administration and Objections	Review and analyze convenience claims report (.3); Follow-up telephone call with R. Sainvil (.1)	0.40	\$775.00	\$0.00	\$310.00
			B310 TOTAL:	0.90		\$0.00	\$559.00
06.13.2024	RAW	B320 Plan and Disclosure Statement (including Business Plan)	Review confirmation brief supporting declaration and additional plan supplement	1.10	\$775.00	\$0.00	\$852.50
06.20.2024	RAW	B320 Plan and Disclosure Statement (including Business Plan)	Review UST's plan confirmation objection (.3); Telephone call with H. Light (.1)	0.40	\$775.00	\$0.00	\$310.00
06.21.2024	RAW	B320 Plan and Disclosure Statement (including Business Plan)	Telephone call with R. Sainvil regarding confirmation hearing, interim fee applications, UST's objections and related matters	0.20	\$775.00	\$0.00	\$155.00
06.24.2024	RAW	B320 Plan and Disclosure Statement (including Business Plan)	Telephone call with R. Sainvil regarding plan voting, remaining plan objections, resolution of issues for interim fee applications and other issues	0.20	\$775.00	\$0.00	\$155.00
06.28.2024	RAW	B320 Plan and Disclosure Statement (including Business Plan)	Prepare for hearing	1.60	\$775.00	\$0.00	\$1,240.00
06.28.2024	MMD	B320 Plan and Disclosure Statement (including Business Plan)	Review email message from R. Weber regarding liquidation analysis (.1); Review docket download liquidation analysis and email to same (.1)	0.20	\$300.00	\$0.00	\$60.00

Date	Timekeeper	Activity	Description	Hours	Rate	Discount	Total Fees
07.03.2024	MMD	B320 Plan and Disclosure Statement (including Business Plan)	Retrieve <i>Debtors' Supplemental Memorandum of Law in Support of Limited Releases Under Chapter 11 Plan</i> and email same to R. Weber	0.10	\$300.00	\$0.00	\$30.00
07.03.2024	RAW	B320 Plan and Disclosure Statement (including Business Plan)	Telephone call with A. Cole regarding meeting with liquidating trustee (.2); Telephone call with M. Kirschner and A. Cole regarding transition of matters to liquidation trust and related issues (.5)	0.70	\$775.00	\$0.00	\$542.50
07.03.2024	RAW	B320 Plan and Disclosure Statement (including Business Plan)	Review supplemental brief on plan releases	0.30	\$775.00	\$0.00	\$232.50
07.03.2024	ADC	B320 Plan and Disclosure Statement (including Business Plan)	Telephone call with R. Weber regarding preparing for call with liquidating trustee	0.20	\$795.00	\$0.00	\$159.00
07.03.2024	ADC	B320 Plan and Disclosure Statement (including Business Plan)	Telephone call with liquidating trustee and R. Weber regarding liquidating trust matters	0.50	\$795.00	\$0.00	\$397.50
07.09.2024	RAW	B320 Plan and Disclosure Statement (including Business Plan)	Telephone call with liquidating trustee (.3); Follow-up with A. Cole (.1)	0.40	\$775.00	\$0.00	\$310.00
07.09.2024	ADC	B320 Plan and Disclosure Statement (including Business Plan)	Telephone call with liquidating trustee and R. Weber regarding administration issues	0.30	\$795.00	\$0.00	\$238.50
07.09.2024	ADC	B320 Plan and Disclosure Statement (including Business Plan)	Follow-up telephone call with R. Weber regarding liquidating trustee issues	0.10	\$795.00	\$0.00	\$79.50
07.10.2024	RAW	B320 Plan and Disclosure Statement (including Business Plan)	Telephone call with P. Keenan regarding plan plan administration matters	0.30	\$775.00	\$0.00	\$232.50
07.15.2024	RAW	B320 Plan and Disclosure Statement (including Business Plan)	Review plan and liquidating trust provisions (.4); Telephone call with R. Sainvil regarding same (.2)	0.60	\$775.00	\$0.00	\$465.00
07.15.2024	RAW	B320 Plan and Disclosure Statement (including Business Plan)	Telephone calls emails with M. Kirschner and A Cole regarding plan liquidating trust data management and collection matters (1.2); Review updated AR summary and follow-up with M. Kirschner (.3)	1.50	\$775.00	\$0.00	\$1,162.50
07.19.2024	MMD	B320 Plan and Disclosure Statement (including Business Plan)	Retrieve <i>Written Opinion Regarding U.S. Trustee's Objections to Confirmation of Debtors' Fourth Amended Plan</i> and email same to A. Cole and R. Weber	0.10	\$300.00	\$0.00	\$30.00
07.19.2024	RAW	B320 Plan and Disclosure Statement (including Business Plan)	Review decision regarding plan releases	0.40	\$775.00	\$0.00	\$310.00
07.22.2024	RAW	B320 Plan and Disclosure Statement (including Business Plan)	Review research and respond to request from R. Sainvil for information relating to KERP	0.30	\$775.00	\$0.00	\$232.50
07.23.2024	RAW	B320 Plan and Disclosure Statement (including Business Plan)	Telephone call with R. Sainvil regarding plan KERP and other issues (.2); Follow-up research and respond to R. Sainvil (.2)	0.40	\$775.00	\$0.00	\$310.00
07.24.2024	RAW	B320 Plan and Disclosure Statement (including Business Plan)	Review plan, liquidating trust documents and follow-up communications with Kroll, A. Cole, M. Kirschner regarding claims reports and other matters	0.50	\$775.00	\$0.00	\$387.50
07.24.2024	ADC	B320 Plan and Disclosure Statement (including Business Plan)	Telephone call with M. Kirschner and R. Weber regarding plan and trust issues	0.20	\$795.00	\$0.00	\$159.00
07.30.2024	MMD	B320 Plan and Disclosure Statement (including Business Plan)	Retrieve <i>Findings of Fact, Conclusions of Law and Order Confirming Fourth Amended Joint Plan</i> and email same to R. Weber and A. Cole	0.10	\$300.00	\$0.00	\$30.00
			B320 TOTAL:	10.70		\$0.00	\$8,081.00
07.10.2024	RAW	L140 Document/File Management	Telephone call with R. Hitchens of DLS regarding database hosting and related matters	0.30	\$775.00	\$0.00	\$232.50

Date	Timekeeper	Activity	Description	Hours	Rate	Discount	Total Fees
07.11.2024	RAW	L140 Document/File Management	Communication with F. Kam and H.Light regarding data management and preservation	0.20	\$775.00	\$0.00	\$155.00
			L140 TOTAL:	0.50		\$0.00	\$387.50
07.10.2024	RAW	L150 Budgeting	Communications with H. Light and M. Schofield at Riveron regarding budgeting, accruals and fee escrow	0.20	\$775.00	\$0.00	\$155.00
			L150 TOTAL:	0.20		\$0.00	\$155.00
06.05.2024	RAW	L160 Settlement/Non-Binding ADR	Prepare for/attend call with client representative, JP Ibarra regarding Colombian contracts matters and possible settlement with counterparty (.6); Draft form of settlement agreement and forward to client (.6)	1.20	\$775.00	\$0.00	\$930.00
06.06.2024	RAW	L160 Settlement/Non-Binding ADR	Review settlement procedures order (.2); Review settlement agreements (.4); Draft and revise certificate of no objection and order for approval of additional settlements (1.5); Communications with JP Ibarra regarding same (.4)	2.50	\$775.00	\$0.00	\$1,937.50
06.07.2024	RAW	L160 Settlement/Non-Binding ADR	Communications with J.P. Ibarra, H. Light and H. Walsh regarding Argopecuaria settlement (.3); Revise certification of counsel and form of order in support of settlement approval (.3)	0.60	\$775.00	\$0.00	\$465.00
06.10.2024	RAW	L160 Settlement/Non-Binding ADR	Review Atlantic Droga markup of settlement agreement (.1); Emails with H. Walsh regarding settlement agreement and negotiations with Atlantic Droga (.2)	0.30	\$775.00	\$0.00	\$232.50
06.10.2024	RAW	L160 Settlement/Non-Binding ADR	Prepare for settlement call with SBUX counsel	0.70	\$775.00	\$0.00	\$542.50
06.10.2024	RAW	L160 Settlement/Non-Binding ADR	Settlement call with SBUX counsel (.4); Follow-up call with H. Light, P. Keenan, A. Cole and R. Sainvil regarding SBUX settlement discussions (.3)	0.70	\$775.00	\$0.00	\$542.50
06.11.2024	RAW	L160 Settlement/Non-Binding ADR	Communications from and to chambers regarding form of order on omnibus settlement approval motion	0.30	\$775.00	\$0.00	\$232.50
06.12.2024	RAW	L160 Settlement/Non-Binding ADR	Telephone call with R. Sainvil regarding status of settlement approval order, confirmation brief and objection schedule and related matters (.2); Follow-up emails with R. Sainvil regarding same (.1)	0.30	\$775.00	\$0.00	\$232.50
06.13.2024	RAW	L160 Settlement/Non-Binding ADR	Communications with H. Light and H. Walsh regarding settlement negotiations with certain A/R counterparties	0.60	\$775.00	\$0.00	\$465.00
06.17.2024	RAW	L160 Settlement/Non-Binding ADR	Review and respond to communications from H. Walsh regarding settlement negotiations with SBUX (.3); Review and respond to communications from J.P. Ibarra regarding settlement with Colombian counterparties (.2)	0.50	\$775.00	\$0.00	\$387.50
06.18.2024	RAW	L160 Settlement/Non-Binding ADR	Review and respond to client communications from J.P. Ibarra regarding settlement with Agropecuaria parties (.3); Review and respond to communications from H. Walsh regarding SBUX settlement negotiations (.3)	0.60	\$775.00	\$0.00	\$465.00
06.19.2024	RAW	L160 Settlement/Non-Binding ADR	Emails and telephone call with H. Light regarding settlement negotiations with SBUX and other counterparties	0.40	\$775.00	\$0.00	\$310.00
06.20.2024	RAW	L160 Settlement/Non-Binding ADR	Review and respond to inquiry from settling party regarding effective date of settlement approval order	0.20	\$775.00	\$0.00	\$155.00
06.20.2024	RAW	L160 Settlement/Non-Binding ADR	Review and organize documents to share with counsel for SBUX in settlement negotiations (1.3); Communications with M. Dero to arrange for bates labeling of same (.2)	1.50	\$775.00	\$0.00	\$1,162.50
06.27.2024	RAW	L160 Settlement/Non-Binding ADR	Review settlement agreements with Cofiroasters, Atlantic Droga and others (.4); Review and revise certificate of no objection for approval of certain A/R settlements (.3)	0.70	\$775.00	\$0.00	\$542.50
07.18.2024	RAW	L160 Settlement/Non-Binding ADR	Review and respond to client communications regarding settlement communications with counsel for AR counterparty (.2); Follow-up with counsel for AR counterparty and A. Cole (.1)	0.30	\$775.00	\$0.00	\$232.50
07.19.2024	RAW	L160 Settlement/Non-Binding ADR	Review research and respond to inquiry from H. Light regarding settlement with certain counterparties	0.40	\$775.00	\$0.00	\$310.00

Date	Timekeeper	Activity	Description	Hours	Rate	Discount	Total Fees
			L160 TOTAL:	11.80		\$0.00	\$9,145.00
06.28.2024	RAW	L450 Trial and Hearing Attendance	Attend hearing	1.50	\$775.00	\$0.00	\$1,162.50
07.29.2024	RAW	L450 Trial and Hearing Attendance	Attend continued hearing regarding plan confirmation and releases matters	0.30	\$775.00	\$0.00	\$232.50
			L450 TOTAL:	1.80		\$0.00	\$1,395.00
			TOTAL FEES FOR JUNE 1, 2024 THROUGH JULY 31, 2024:	108.10		\$0.00	\$68,546.50

Date	Activity	Description	Total Expense
06.28.2024	E105 Telephone	Court Solutions (R. Weber's Participation in June 28 2024 Confirmation Hearing)	\$70.00
07.29.2024	E105 Telephone	Court Solutions (R. Weber's Attendance at July 29 2024 Hearing)	\$70.00
		E105 TOTAL:	\$140.00
06.18.2024	E107 Delivery services/messengers	Reliable (FedEx Invoice No. WL116349-A))	\$132.35
06.19.2024	E107 Delivery services/messengers	Reliable (FedEx [Invoice No. WL116938-A])	\$22.07
06.24.2024	E107 Delivery services/messengers	FedEx Shipping (Invoice No. 8-547-94920)	\$76.72
06.24.2024	E107 Delivery services/messengers	FedEx Shipping (Invoice No. 8-547-94920)	\$39.55
07.12.2024	E107 Delivery services/messengers	Reliable (FedEx Shipping [Invoice No. WL116871-A])	\$29.37
		E107 TOTAL:	\$300.06
06.26.2024	E108 Postage	Reliable (Mailing Services [Invoice No. WL117538])	\$25.80
		E108 TOTAL:	\$25.80
		TOTAL EXPENSES FOR JUNE 1, 2024 THROUGH JULY 31, 2024:	\$465.86

NOTICE PARTIES

<p><i>Mercon Coffee Corporation</i> Attn: Harve Light Email: harve.light@riveron.com</p>	<p>Daniel Rudewicz, Esquire <i>Office of the United States Trustee for the Southern District of New York</i> Alexander Hamilton Custom House One Bowling Green, Suite 515 New York, New York 10004 Email: daniel.rudewicz@usdoj.gov</p>
<p>Gregory M. Wilkes, Esquire Scott P. Drake, Esquire <i>O'Melveny & Myers, LLP</i> 2801 North Harwood Street, Suite 1600 Dallas, Texas 75201 Email: gwilkes@omm.com sdrake@omm.com (Counsel to the Official Committee of Unsecured Creditors)</p>	<p>Louis R. Strubeck, Jr., Esquire Matthew P. Kremer, Esquire <i>O'Melveny & Myers, LLP</i> 7 Times Square New York, New York, 10036 Email: lstrubeckjr@omm.com mkremer@omm.com (Counsel to the Official Committee of Unsecured Creditors)</p>
<p>Ingrid Bagby, Esquire Andrew M. Greenberg, Esquire Cadwalader, Wickersham & Taft LLP 200 Liberty Street New York, New York 10281 Email: ingrid.bagby@cwt.com andrew.greenberg@cwt.com (Counsel to Coöperative Rabobank U.A. New York Branch, as administrative agent under the Debtors' prepetition first lien credit agreement)</p>	